

STROOCK

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to 1/3/20*

November 27, 2019

*John Hellerstein
12-5-19*

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Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Chambers v. HSBC Bank USA, N.A., Case No. 1:19-cv-10436-AKH

Dear Judge Hellerstein:

We represent defendant HSBC Bank USA, N.A. ("HSBC") in the above-referenced action and write to request an extension of time to respond to the Complaint filed by plaintiff Patrice Chambers ("Plaintiff"). The current deadline for HSBC to respond is December 6, 2019. To provide HSBC with additional time to investigate the allegations in the Complaint and in light of the year-end holidays, HSBC requests a 30-day extension, to and including January 6, 2020, to respond to the Complaint. HSBC has not previously requested any extension and Plaintiff, by and through Plaintiff's counsel, consents to the extension requested herein.

Respectfully submitted,

/s/ Raymond A. Garcia

Raymond A. Garcia

cc: All Counsel (via ECF)

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